

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

CITY of DETROIT, MICHIGAN

Debtor.

) Chapter 9

) Case No. 13-53846

) Hon. Thomas J. Tucker

U.S. BANKRUPTCY COURT  
E.D. MICHIGAN - DETROIT

2015 MAR 19 9 43 AM

FILED

**EX PARTE MOTION TO PERMIT TRADITIONAL PAPER FILINGS**

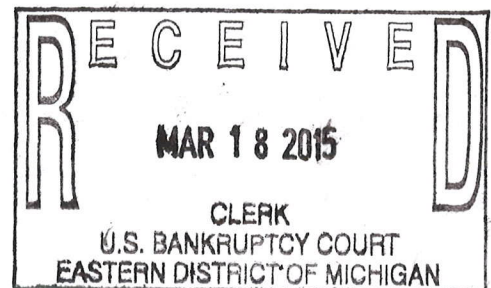
NOW COMES The Lobb Law Firm, and for its Ex Parte Motion to Permit Traditional Paper Filings, states as follows:

1. On October 8, 2014, this Court granted Debtor's Fifth and Sixth Objections to Certain Claims, disallowing a number of creditors' claims against Debtor on the basis that the claims were not timely filed.

2. Included in these disallowed claims were a number of clients of The Lobb Law Firm who have judgments or pending claims against Debtor:

- a. Carlita Buffington (Claim No. 3582).
- b. Melyni Richardson (Claim No. 3586).
- c. Bridgett Scott (Claim No. 3587).
- d. Gina Parker (Claim No. 3581).
- e. Clear Imaging & Michigan Spine & Rehab (Claim No. 3580).
- f. Clear Imaging, Michigan Spine & Rehab, Universal Health Group (Claim No. 3585).

3. The Lobb Law Firm now seeks to file a Motion for Reconsideration Regarding Claims Nos. 3580, 3581, 3582, 3586, 3587.



4. Rule 5005-4 of United States Bankruptcy Court for the Eastern District of Michigan's Local Rules states: "All papers shall be filed using the ECF Procedures. Traditional Filings may be authorized as provided in those procedures."

5. ECF Rules require that attorneys admitted to practice in the United States District Court for the Eastern District of Michigan register as "filers" in the ECF system and receive ECF training from the court before papers may be filed in accordance with ECF procedures. ECF Procedure 4.

6. ECF Procedure 3(a) further provides that this Court will only accept papers filed using ECF procedures, unless upon a motion showing good cause this Court enters an order authorizing a traditional filing of a particular paper.

7. Procedure 3(b) further delineates which papers shall be filed by a traditional paper filing. Subsection (b)(6) provides that "other papers" may be filed on a limited basis if permitted by the judge upon a motion showing good cause.

8. The Lobb Law Firm is a personal injury firm that primary handles automobile accident cases arising under Michigan's No-Fault Act. It is not a bankruptcy firm and does not do any practice in this Court or any other United States Bankruptcy Court.

9. The Lobb Law Firm does not have a registered "filer" authorized to file papers in this Court in accordance with ECF procedures.

10. The Lobb Law Firm's only involvement in this matter is simply to preserve the interests of the aforementioned clients who either have personal injury judgments against Debtor or pending claims. The firm is only seeking to file papers for the limited basis of filing a Motion for Reconsideration regarding the disallowed claims of its clients.

WHEREFORE, The Lobb Law Firm respectfully requests that this Honorable Court permit the filing of traditional paper documents in order to file its Motion for Reconsideration Regarding Claims Nos. 3580, 3581, 3582, 3586, 3587.

Respectfully submitted,

THE LOBB LAW FIRM

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